

REMARKS

The Office Action dated July 28, 2004 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 15-24 are submitted for consideration.

Claims 15-24 were rejected under 35 U.S.C.103(a) as being unpatentable over U.S. Patent No. 5,644,698 to Cannon in view of U.S. Patent No. 6,189,017 to Ronstrom et al. The rejection is traversed as being based on references that neither teach nor suggest the novel combination of features clearly recited in independent claims 15 and 20.

Claim 15, upon which claims 16-19 depend, recites a method for restoring a backup copy in a telecommunication system. The telecommunications system includes at least two computer units, each comprising means for generating a backup copy of the computer unit. The computer units belong to a telephone exchange system. The telecommunications system also includes a backup unit comprising means for storing a backup copy. The backup unit also belongs to a telephone exchange system. The telecommunication system further includes a communication system connecting the computer units to the backup unit. The method includes the steps of saving the backup copies of the computer units to the backup unit and saving identification data identifying the computer unit to the backup unit in conjunction with the backup copy. The

identification data is either obtained from data transmitted in the signaling of the communication system or appended to the backup copy by the computer unit. The method also includes the steps of directing a backup copy to a computer unit on the basis of the identification data; and restoring the backup copies to the appropriate computer units identified by the identification data automatically.

Claim 20, upon which claims 21-24 depend, recites a system for restoring a backup copy in a telecommunication system. The system includes at least two computer units, each comprising means for generating a backup copy of the computer unit. The computer units belong to a telephone exchange system. The system also includes a backup unit comprising means for storing a backup copy. The backup unit also belongs to a telephone exchange system. The system further includes a communication system connecting the computer units to the backup unit, means for storing the backup copies of the computer units in the backup unit, and means for saving identification data identifying the computer unit to the backup unit in conjunction with the backup copy. The identification data is either obtained from data transmitted in the signaling of the communication system or appended to the backup copy by the computer unit. The system also includes means for directing a backup copy to a computer unit on the basis of the identification data and means for restoring the backup copies to the appropriate computer units identified by the identification data automatically.

As will be discussed below, the cited prior art references of Cannon and Ronstrom et al. fail to disclose or suggest the elements of any of the presently pending claims.

Cannon teaches a data processing system that includes multiple client systems that are coupled to a server system. The server system includes a storage manager that is coupled to a server database and a plurality of storage volumes. Col. 5, lines 46-49. Each client system creates and stores client files. The client files are transferred to the server system to provide a back-up mechanism within the server. Col. 5, lines 54-59. The server stores a first copy of the client file on a primary storage volume and may also generate additional backup copies on copy storage volumes. The storage manager maintains directory information about the client file and references location information pertaining to the copies of the client file within the server database. Col. 5, lines 59-67. The storage manager can cross reference multiple copies of an individual client file written to different storage volumes. Col. 6, lines 4-6. The storage manager can recover a copy of the client file from a back-up copy.

Ronstrom et al. teaches a distributed data base that includes a primary replica and a secondary replica. The replicas are stored on separate nodes to spread the risk of loss should one or more nodes crash. Col. 7, lines 22-42. If a first node crashes than the primary replica can be re-created through data and log information available in the secondary replica. Col. 7, lines 63-67. The system also includes a stand-by replica which is stored on a third node, separated from the nodes on which the primary and secondary replicas are stored. The stand-by replica only stores received log information which can be used to re-create a primary replica should a node on which the primary replica is stored crashes. Col. 8, lines 1-32.

Applicants respectfully submit that the combination of Cannon and Ronstrom fail to teach or suggest the combination of features in any of the presently pending claims. Claims 15 and 20 recite, in part, restoring the backup copies to the appropriate computer units identified by the identification data **automatically**. Neither Cannon nor Ronstrom et al. discusses or even suggests automatic restoration of the backup to the computer unit with the help of identification data as recited in claims 15 and 20. The Office Action states that Col. 5, lines 54-59 and columns 6-7 of Cannon teach means for restoring the backup copies to the appropriate computer units identified by the identification data automatically as recited in claims 15 and 20. The cited column of Cannon merely teaches that client files are saved on the client system and transferred to the server database to create a backup copy. According to the cited sections of Cannon, the server stores a primary copy of the client file on a primary server volume and secondary copies on secondary volumes. Col. 6, line 30-Col. 7, line 35 and figure 2 of Cannon further teach that the server database includes a server storage inventory, a server storage reference list and a storage volume list for maintaining directory information about the client file and reference location information pertaining to the copies of the client file within the server database. Col. 7, lines 35-62 and figure 3 of Cannon describe a method for updating a storage volume status as the last remaining copy is moved or deleted from the storage volume. As such, there is simply no discussion or suggestion in Cannon of **automatically restoring** the backup copies to the appropriate computer units identified by the identification data as recited in claims 15 and 20. In fact, Cannon is directed to

maintaining the storage and database and the possibility of reusing the backup unit for new data according to a set criterion. Therefore, there is no suggestion in Cannon about automatic restoration of data from backups to the computer units as recited in claims 15 and 20. Ronstrom et al. does not cure the deficiencies of Cannon as discussed above. Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Cannon nor Ronstrom et al., whether taken singly or combined, teaches or suggests the combination of features of claims 15 and 20 and hence, dependent claim 16-19 and 21-24 thereon.

As noted previously, claims 15-24 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 15-24 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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